

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

FILED

NOV 16 2005

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO

MA. ANAHAW A. PEASEL

**NAME OF THE PLAINTIFF OR PLAINTIFFS**

(Enter above the full names of each plaintiff in this action.)

- vs -

TRANS STATES AIRLINES

Case No.

EEOL#28EA500467

FEDA#E-12/04-27846

**NAME OF THE DEFENDANT OR DEFENDANTS:**

(Enter above the full name of ALL defendant(s) in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the name of all the parties. Please attach additional sheets if necessary.)

4: 05CV02172AGF

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964, as amended, for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Venue is proper in this district under 42 U.S.C. § 2000e-5(f)(3).

2. Plaintiff MA. ANAHAW A. PEASEL  
(name of plaintiff)

resides at: 14001 S. HARVEY AVE., OKLAHOMA CITY  
(street address) (city)

OKLAHOMA, 73170  
(state) (ZIP code)

Phone: (405) 7993376.

3. The defendant TRANS STATES AIRLINES  
(name of defendant)

is an employer, employment agency, or labor organization, as  
defined in 42 U.S.C. § 2000e, and lives at or its place of business  
is located at:

SUITE 340  
11495 NATURAL BRIDGE ROAD BRIDGETON  
(street address) (city)

ST. LOUISE MO 63044  
(county) (state) (zip code)

**NOTE: IF THERE IS MORE THAN ONE PERSON FILING THE COMPLAINT OR IF  
YOU ARE SUING MORE THAN ONE PERSON OR COMPANY, PLEASE ADD THE NAMES  
AND ADDRESSES OF THE ADDITIONAL PERSONS OR COMPANIES ON A SEPARATE  
SHEET OF PAPER. COPY THE LANGUAGE IN PARAGRAPHS 2 AND 3 FOR  
ADDITIONAL PLAINTIFFS OR DEFENDANTS.**

4. The address at which plaintiff sought employment or was  
employed by the defendant(s) is: SUITE 340 11495 NATURAL BRIDGE ROAD  
(street address)

BRIDGETON ST. LOUISE MO 63044  
(city) (county) (state) (zip code)

5. Defendant discriminated against the plaintiff in the  
manner indicated in paragraphs 9 and 10 of this complaint on or  
about: NOVEMBER 10 2004  
(month) (day) (year)

6. Plaintiff filed charges against the defendant with the  
Missouri Commission on Human Rights, charging defendant with the  
acts of discrimination indicated in paragraphs 9 and 10 of this  
complaint, on or about DECEMBER 13 2004  
(month) (day) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission, charging defendant with the acts of discrimination indicated in paragraphs 9 and 10 of this complaint, on or about DECEMBER 13 2004.  
(month) (day) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue Letter which was received by the plaintiff on SEPTEMBER 15 2005, a copy of which is attached to  
(month) (day) (year)  
this complaint.

9. The acts that I complain of in this suit, concern defendant's:

(a)        failure to employ me.

(b)   1   termination of my employment.

(c)        failure to promote me.

(d)   1   other acts (specify): HARASSMENTS,  
DISCRIMINATION, RETALIATION, JOB TERMINATION

10. Defendant's action(s), as stated in paragraph 9, is discriminatory with respect to the following:

(a)        my race.

(d)   1   my national  
origin

(b)        my religion.

(f)   1   other (specify)

(c)        my sex.

DUE TO COMPLAINS FILED  
WITH HUMAN RIGHTS AND UNION.

11. The circumstances under which defendant(s) discriminated against the plaintiff were as follows (Note: if you are suing more than one defendant, please complete this question with regard to each of the named defendants): TRANS STATES AIRLINES  
BEGUN RETALIATING ME AFTER I FILED COMPLAINTS  
WITH EEOC, FEPA AND BRIEVANCES WITH TEAMSTERS 618  
UNION REGARDING HARASSMENTS, DISCRIMINATION AND  
RETALIATIONS AT WORK. BEFORE MY ARBITRATION LAST  
21ST OF SEPTEMBER OF THE CURRENT YEAR, I WAS OFFERED  
MONETARY AND OTHER SETTLEMENTS BY THE COMPANY THROUGH  
THE UNION IN ORDER NOT TO PURSUE THE ARBITRATION. I  
DECLINED THE OFFER AT THAT TIME AND PROCEEDED WITH  
THE ARBITRATION (RESULTS OF IT IS STILL IN PROCESS).  
LAST 10-12-2005 COMPANY MADE SETTLEMENT OFFERS  
AGAIN AND ASKING ME TO RESIGN AND FAX MY RESIGNATION  
THAT SAME DAY. I ACCEPTED THE OFFERS AND FAXED  
MY RESIGNATION THAT DAY 12TH OF OCTOBER, AFTER  
THEY RECEIVED MY RESIGNATION THE UNION INFORMED  
ME THAT THE COMPANY TERMINATED ME EFFECTIVE  
10-13-2005 AND AM NO LONGER ENTITLED TO ANY  
KIND OF SETTLEMENT INCLUDING MY VACATION PAY  
SINCE THEY TERMINATED ME.

(Attach additional sheets as necessary.)

12. The acts set forth in paragraph 9 of this complaint are:

- (a)   1   still being committed by the defendant.
- (b)            are no longer being committed by the defendant.
- (c)            may still be being committed by the defendant.

13. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, and submits said charges as a brief statement of the facts supporting this complaint.

Wherefore, plaintiff prays for (state what relief is sought):

SETTLEMENT OFFERS PROMISED TO ME: \$7500, VACATION PAY,  
CLEAR MY RECORDS STATEMENTS, PAY FOR HOURS LOST,  
BACK PAY, MONETARY AND OTHER DAMAGES PAY AND LEGAL FEES,  
ELSE THE COURT DEEMS JUST AND PROPER.

and such other relief as the Court would allow under Title VII of the Civil Rights Act of 1964, as amended.

Signed this 13 day of OCTOBER, 2005.

Mr. Abraham A. Reacy

\_\_\_\_\_  
Signature of Plaintiff(s)